

3. Modifications to Scheduling Order and Expert Discovery

The parties request that the Scheduling Order be modified to defer expert discovery until after dispositive motions are decided. The parties request that April 5, 2017 remain as the deadline for fact discovery, as the proposed order currently provides and are not seeking any other modifications to the scheduling order.

4. Deposition Hours

At this time, the parties agree that each side will require fifty (50) hours of deposition time.

5. Consent to Proceed Before United States Magistrate Judge

The parties do not consent to proceed before a United States Magistrate Judge at this time.

Date: December 2, 2016

/s/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2nd day of December, 2016, a copy of foregoing was served by the Court's ECF filing system on:

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